

V. The Terms and Conditions in U S WEST's 800 Access Tariff Are Reasonable

This section responds to the handful of comments that have been made in connection with a few of the terms and conditions contained in U S WEST's interstate access tariff which have been questioned.

A. Basic Area of Service Screening. One commenter expresses concern that, although it understands that "U S WEST intend[s] to offer the full range of geographic routing (except ANI) as basic services," U S WEST failed to provide "any confirmation" of this fact because it "failed to address AOS routing in its direct case as directed by the Commission."⁵⁰

U S WEST did not address area-of-service routing in its direct case because it had earlier addressed the issue in full.⁵¹ In any event, U S WEST has routed, and will continue to route calls based upon the originating state, LATA, NPA, or NPA-NXX as part of the basic carrier identification function.⁵²

B. Query Charge Imposed on Delivered Calls Only. One commenter says that it is confused over the practice U S WEST has followed the past

⁵⁰MCI at 54.

⁵¹U S WEST Reply to Petitions, Transmittal No. 335, at 17-18 (March 29, 1993). U S WEST must express its surprise that there remains any confusion over this matter because, as this commenter knows full well, U S WEST has followed this practice since introducing 800 data base over a year ago. It is noteworthy that this same confusion is not shared by other inter-exchange carriers. See, e.g., Sprint at 2 n.3.

⁵²In addition to obtaining AOS routing with its basic service, a customer may order the vertical feature, Routing by Originating NPA-NXX-XXXX, which enables the customer to specify one or more multiple terminations based upon the originating telephone number.

year — that is, whether it imposes the carrier identification charge on all 800 call attempts resulting in a data base query or only those call attempts where the 800 call is actually delivered to the 800 carrier.⁵³ U S WEST does not believe that its tariff is ambiguous on this point:

An 800 Carrier Identification Charge is assessed per call to the service provider the call is delivered to in accordance with SMS/800 information residing in the Telephone Company's SCP.⁵⁴

In any event, to remove any ambiguity, U S WEST hereby confirms that it will continue its past practice of imposing its carrier identification charge only on those 800 call attempts actually delivered to an interexchange carrier. In contrast, the query charges for the Call Handling and Destination vertical feature will be assessed whether or no the call is completed to the carrier.

C. Tariffing of RESPORG Services. U S WEST did not file RESPORG tariffs and one commenter asks that the Commission "require [U S WEST] to file RESPORG tariffs."⁵⁵ U S WEST did not file interstate RESPORG tariffs because, as it has previously explained, it does not provide RESPORG services in connection with interstate 800 services.⁵⁶

⁵³See MCI at 57-60.

⁵⁴U S WEST Tariff F.C.C. No. 1, § 6.7.1(F).

⁵⁵MCI at 60.

⁵⁶See U S WEST Reply to the Petitions to Reject or Suspend, Transmittal No. 335, at 18 (March 29, 1993). However, if this commenter is correct that RESPORG services are communications services which must be tariffed, then this particular commenter has violated the Communications Act by offering RESPORG services on an untariffed basis.

D. Vertical Feature Use Restriction. One commenter asks the Commission to require exchange carriers to amend their tariffs to incorporate a prohibition on the sale of vertical features to end users (even though there is a Commission order precisely on point).⁵⁷ U S WEST does not market vertical features to end users because, as it has previously explained,⁵⁸ it does not offer RESPORG services in connection with interstate 800 services and because its tariff states that vertical features may be obtained only "through a Responsible Organization" (RESPORG).⁵⁹

VI. Conclusion

U S WEST continues to believe that use of a cost model provides the best and most accurate method for developing rates for new capabilities which utilize complex technologies like 800 data base. The Common Carrier Bureau has determined, at least in connection with this particular capability, "between precision and public disclosure, we opt for public disclosure."⁶⁰

U S WEST has included as part of its direct case only some of the costs it has incurred specifically to provide 800 data base access service. The costs it has submitted are reasonable (they were certainly necessary); and the allocation factors U S WEST has used are likewise reasonable (if not overly con-

⁵⁷MCI at 60. MCI says that U S WEST's "failure to explain how it intends to market vertical features . . . is particularly egregious."

⁵⁸See U S WEST Reply to the Petitions, Transmittal No. 335, at 18 (March 29, 1993).

⁵⁹U S WEST Tariff F.C.C. No. 1, ¶ 6.2.8(A) and (B).

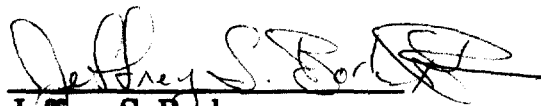
⁶⁰800 Cost Model Order, 9 FCC Rcd 715, 718 ¶ 12 (CCB, Jan. 31, 1994).

servative). In any event, as the Bureau has already declared, absolute precision is not required.

U S WEST does, however, reserve the right to submit additional 800 data base costs if the Commission adjusts the costs U S WEST did submit or changes the allocation factors U S WEST used and if these changes cause U S WEST to lower its per-call basic 800 query rate to fall below cost.

Respectfully submitted

U S WEST Communications, Inc.



Jeffrey S. Bork
1020 19th Street, N.W., Suite 700
Washington, D.C. 20036
303-672-2700

Laurie Bennett, Of Counsel

May 5, 1994

U S WEST Communications

TRAFFIC SENSITIVE
800 DATA BASE ACCESS SERVICE FILING

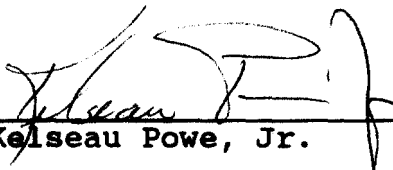
ATTACHMENT A

SERVICE CATEGORY	(A) ANNUAL FILING REVENUES 7/1/92	BASE PERIOD REVENUES	(B) CURR PERIOD REVENUES	(C) PROPOSED REVENUES	(D) REVENUE CHANGE (C) - (B)	(E) REVENUE % CHANGE (C-B)/B
LOCAL TRANSPORT	\$541,286,098	\$540,918,882	\$540,699,548	\$540,699,548	\$0	0.00%
LOCAL SWITCHING	\$348,998,569	\$348,998,569	\$348,998,569	\$346,643,225	(\$2,355,344)	-0.67%
INFORMATION	\$37,687,151	\$37,687,151	\$37,687,151	\$37,687,151	\$0	0.00%
800 DATA BASE	\$0	\$0	\$0	\$6,681,634	\$6,681,634	100.00%
TOTAL	\$927,971,818	\$927,604,602	\$927,385,268	\$931,711,558	\$4,326,290	0.47%

800 NXX		\$0.001299
EXOGENOUS COST	\$4,326,788	
800 CIC DEMAND	1,813,197,867	
ADD'L COST/UNIT		<u>\$0.002386</u>
MAXIMUM UNIT PRICE		\$0.003685

CERTIFICATE OF SERVICE

I, Kelseau Powe, Jr., do hereby certify that on this 5th day of May, 1994, I have caused a copy of the foregoing **U S WEST FURTHER SUPPLEMENT TO DIRECT CASE AND RESPONSE TO COMMENTS**, to be served via first-class United States Mail, postage prepaid, upon the persons listed on the attached service list.


Kelseau Powe, Jr.

***Via Hand-Delivery**

(CC93-129/DM/lh)

*A. Richard Metzger, Jr.
Federal Communications Commission
Room 500
1919 M Street, N.W.
Washington, DC 20554

*Thomas Quaile
Federal Communications Commission
Room 518
1919 M Street, N.W.
Washington, DC 20554

*Thomas G. David
Federal Communications Commission
Room 518
1919 M Street, N.W.
Washington, DC 20554

*Mark Uretsky
Federal Communications Commission
Room 518
1919 M Street, N.W.
Washington, DC 20554

*Gregory J. Vogt
Federal Communications Commission
Room 518
1919 M Street, N.W.
Washington, DC 20554

*Peggy Reitzel
Federal Communications Commission
Room 544
1919 M Street, N.W.
Washington, DC 20554

*Judith A. Nitsche
Federal Communications Commission
Room 518
1919 M Street, N.W.
Washington, DC 20554

*Gary Phillips
Federal Communications Commission
Room 544
1919 M Street, N.W.
Washington, DC 20554

*Steven Funkhouser
Federal Communications Commission
Room 518
1919 M Street, N.W.
Washington, DC 20554

*Tariff Division
Federal Communications Commission
Room 518
1919 M Street, N.W.
Washington, DC 20554

***International Transcription
Services
Suite 140
2100 M Street, N.W.
Washington, DC 20037**

**William A. Blase, Jr.
Southwestern Bell Corporation
Suite 1000
1667 K Street, N.W.
Washington, DC 20006**

**Robert C. Mackinchan, Jr.
Vincent L. Crivella
General Services Administration
Room 4002
18th & F Streets, N.W.
Washington, DC 20405**

**Gail L. Polivy
GTE Service Corporation
Suite 1200
1850 M Street, N.W.
Washington, DC 20036**

**Paul J. Berman
Ellen K. Snyder
Covington & Burling
1201 Pennsylvania Avenue, N.W.
Washington, DC 20044**

ATU

**Roy L. Morris
J. Scott Nicholls
Allnet Communication Services, Inc.
Suite 500
1990 M Street, N.W.
Washington, DC 20036**

**James P. Tuthill
Nancy C. Woolf
Pacific/Nevada Bell
Room 1523
140 New Montgomery Street
San Francisco, CA 94105**

**Jay C. Keithley
United Telephone Companies
Suite 1100
1850 M Street, N.W.
Washington, DC 20036**

**James L. Wurtz
Pacific/Nevada Bell
Suite 400
1275 Pennsylvania Avenue, N.W.
Washington, DC 20004**

**Craig T. Smith
United Telephone Companies
P.O. Box 11315
Kansas City, MO 64112**

Cindy Z. Schonhaut
Metropolitan Fiber Systems, Inc.
Suite 300
3000 K Street, N.W.
Washington, DC 20007

Carol R. Schultz
MCI Telecommunications Corporation
1801 Pennsylvania Avenue, N.W.
Washington, DC 20006

James B. Gainer
Ann Henkener
Public Utilities Commission
of Ohio
180 East Broad Street
Columbus, OH 43266

Henry D. Levine
Mary K. O'Connell
Levine, Lagapa & Block
Suite 602
1200 19th Street, N.W.
Washington, DC 20036

Joseph P. Markoski
Squire, Sanders & Dempsey
1201 Pennsylvania Avenue, N.W.
P.O. Box 407
Washington, DC 20044

NDC

Mitchell F. Brecher
Terri B. Natoli
Donelan, Cleary, Wood & Maser, P.C.
Suite 850
1275 K Street, N.W.
Washington, DC 20005-4078

Richard McKenna
GTE Service Corporation
P.O. Box 152092
Irving, TX 75015-2092

Mark C. Rosenblum
Robert J. McKee
Judy Sello
American Telephone and Telegraph
Company
Room 2255F2
295 North Maple Avenue
Basking Ridge, NJ 07920

Stuart A.C. Drake
Kirkland & Ellis
Suite 1200
655 15th Street, N.W.
Washington, DC 20005
(2 copies)

CBTC
SNET

Leon M. Kestenbaum
Norina T. Moy
Sprint Communications Company
Suite 1110
1850 M Street, N.W.
Washington, DC 20036

Genevieve Morelli
Competitive Telecommunications
Association
Suite 220
1140 Connecticut Avenue, N.W.
Washington, DC 20036

William J. Balcerski
NYNEX Telephone Companies
Room 427
120 Bloomingdale Road
White Plains, NY 10605

John J. Bartlett
Robert J. Butler
Kurt E. DeSoto
Wiley, Rein & Fielding
1776 K Street, N.W.
Washington, DC 20006

Jeffrey W. Reynolds
Sugar Land Telephone
14141 Southwest Freeway
Sugar Land, TX 77487

Catherine R. Sloan
LDDS Communications, Inc.
Suite 400
1825 Eye Street, N.W.
Washington, DC 20006

M. E. King, Jr.
Nevada Bell
P.O. Box 11010
Reno, NV 89520

Andrew D. Lipman
Richard M. Rindler
Swidler & Berlin, Chartered
Suite 300
3000 K Street, N.W.
Washington, DC 20007

Thomas E. Grace
Ameritech Services
Location 4H70
2000 West Ameritech Center Drive
Hoffman Estates, IL 60196-1025

Eric Fishman
Sullivan & Worchester
1025 Connecticut Avenue, N.W.
Washington, DC 20036

Ronald W. Barkby
Centel Telephone Companies
8745 West Higgins Road
Chicago, IL 60631

Robert A. Mazer
Nixon, Hargrave, Devans & Doyle
Suite 800
One Thomas Circle, N.W.
Washington, DC 20005

LINCOLN

Bob F. McCoy
Joseph W. Miller
John C. Gammie
WilTel, Inc.
P.O. Box 2400
Tulsa, OK 74121

Richard A. Askoff
National Exchange Carrier
Association
100 South Jefferson Road
Whippany, NJ 07981

Michael L. Glaser
Hopper & Kanouff, P.C.
Suite 200
1610 Wynkoop
Denver, CO 80202

Emmanuel Staurulakis
Thomas J. Moorman
John Staurulakis, Inc.
6315 Seabrook Road
Seabrook, MD 20706

CENTURY

Dr. Lee L. Selwyn
Susan M. Gately
Economics and Technology, Inc.
One Washington Mall
Boston, MA 02108-2603

Chris Dugan
Jones, Day, Reavis & Pogue
1450 G Street, N.W.
Washington, DC 20005-2088

Heather Burnett Gold
Association for Local Tele-
communications Services
Suite 1050
1150 Connecticut Avenue, N.W.
Washington, DC 20036

James S. Blaszk
Gardner, Carton & Douglas
Suite 900 - East Tower
1301 K Street, N.W.
Washington, DC 20005

AD HOC

Carolyn C. Hill
ALLTEL Service Corporation
Suite 220
655 15th Street, N.W.
Washington, DC 20005

Stephen G. Kraskin
Kraskin & Associates
Suite 810
2120 L Street, N.W.
Washington, DC 20037

CTO

Elkhart Telephone Company
P.O. Box 817
Elkhart, KS 67950-0817

Chillicothe Telephone Company
P.O. Box 480
Chillicothe, OH 45601-0647

Farmers Telephone Cooperative, Inc.
P.O. Box 217
Rainsville, AL 35986

William D. Baskett, III
Thomas E. Taylor
David S. Bence
Frost & Jacobs
2500 PNC Center
201 East Fifth Street
Cincinnati, OH 45202

CBT

Fidelity Telephone Company
64 North Clark
Sullivan, MO 63080

Citizens Utilities Companies
High Ridge Park
Stamford, CT 06905

Great Plains Communications, Inc.
1626 Washington Street
Blair, NE 68008

Dunkirk and Fredonia Telephone
Company
P.O. Box 209
Fredonia, NY 14063

Hargray Telephone Company
P.O. Box 5519
Hilton Head Island, SC 29938

Illinois Consolidated Telephone
Company
121 South 17th Street
Mattoon, IL 61938

Northwestern Indiana Telephone
Company
P.O. Box 67
Hebron, IN 46341

La Fourche Telephone Company, Inc.
P.O. Box 188
La Rose, LA 70373

Pineland Telephone Cooperative
P.O. Box 678
Metter, GA 30439

Lufkin-Conroe Telephone Exchange
P.O. Box 909
Lufkin, TX 75901

Josephine S. Trubek
Rochester Telephone Corporation
180 South Clinton Avenue
Rochester, NY 14646-0700

Millington Telephone Company, Inc.
4880 Navy Road
Drawer 429
Millington, TN 38083

Roseville Telephone Company
P.O. Box 969
Roseville, CA 95661

Mount Horeb Telephone Company
P.O. Box 65
Mount Horeb, WI 53572

Taconic Telephone Corporation
Taconic Place
Chatham, NY 12037

Alan Y. Naftalin
Charles R. Naftalin
Koteen & Naftalin
1150 Connecticut Avenue, N.W.
Washington, DC 20036

John M. Goodman
Bell Atlantic Telephone Companies
1710 H Street, N.W.
Washington, DC 20006

Union Telephone Company
P.O. Box 428
Plain Dealing, LA 71064

Helen Shockey
Shirley Ranson
BellSouth Telecommunications, Inc.
4300 Southern Bell Center
675 West Peachtree Street, N.E.
Atlanta, GA 30375

Vista Telephone Company
14450 Burnhaven Drive
Burnsville, MN 55337

Robert M. Lynch
Richard C. Hartgrove
Paul Walters
Southwestern Bell Telephone
Company
Room 3330
One Bell Center
St. Louis, MO 63101

Vista-United Telecommunications
P.O. Box 10180
Lake Buena, FL 32830-0180

Eugene J. Baldrate
Southern New England Telephone
Company
227 Church Street
New Haven, CT 06510

Warwick Valley Telephone Company
Warwick Communications
5506 Detroit Avenue
Cleveland, OH 44102

A. W. Brothers
The Beehive Telephone Companies
P.O. Box 520
Wendover, UT 84083

William R. Tempest
DSC Communications Corporation
1000 Coit Road
Plano, TX 75075-5813

Stephen L. Goodman
Halprin, Temple & Goodman
Suite 1020-East Tower
1301 K Street, N.W.
Washington, DC 20005

NTI

Randolph J. May
Timothy J. Cooney
Sutherland, Asbill & Brennan
1275 Pennsylvania Avenue, N.W.
Washington, DC 20004-2104
(2 copies)

CI
FFMC

Raymond L. Strassberger
Northern Telecom, Inc.
Suite 700
801 Pennsylvania Avenue, N.W.
Washington, DC 20004